

# Exhibit C



HAGENS BERMAN

Jennifer Fountain Connolly  
**HAGENS BERMAN SOBOL SHAPIRO LLP**  
1701 Pennsylvania Ave., NW, Suite 300  
WASHINGTON, DC 20006  
www.hbsslaw.com  
jenniferc@hbsslaw.com

***Via Electronic Mail***

March 22, 2017

William T. Burke  
Grant A. Geyerman  
Kylie Hoover  
Williams & Connolly LLP  
725 Twelfth St., N.W.  
Washington, D.C. 20005

Re: *Sheet Metal Workers Local No. 20 Welfare and Benefit Fund v. CVS Health Corp.*, Case No. 1:16-cv-00046-S; *Plumbers Welfare Fund, Local 301, U.A., v. CVS Health Corp.*, Case No. 1:16-cv-00047 (D.R.I.)

Dear Bill, Grant & Kylie:

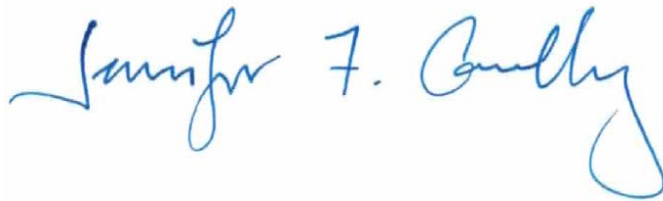
Plaintiffs write regarding the claims data produced by CVS. Specifically, CVS has limited its production of claims data to the data produced in *Corcoran v. CVS Health Corp. & CVS Pharm. Inc.*, No. 15-cv-3504 (N.D. Cal.), which was limited to data for transactions in twelve (12) states and the District of Columbia. The *Corcoran* court held that CVS was only required to produce this data because it dismissed the *Corcoran* plaintiffs' claims in the remaining states. *See Corcoran* Dkt No. 152.

CVS's *Corcoran* limitation is not appropriate here. All of Plaintiffs' statutory and common law claims survived dismissal, and Plaintiffs are seeking to certify a nationwide class of third-party payors, or, in the alternative, a class of TPPs in 32 states. At a bare minimum, Plaintiffs are entitled to data from Indiana, where Plaintiffs Sheet Metals and Indiana Carpenters reside. (Illinois data was produced as part of the *Corcoran* production.)

Letter to counsel for CVS  
March 22, 2017  
Page 2

We therefore request that you promptly produce CVS's claims data on a nationwide basis. Please let us know if CVS will agree to do so.

Very truly yours,

A handwritten signature in blue ink, reading "Jennifer F. Connolly". The signature is written in a cursive, flowing style. The first name "Jennifer" is written with a large, stylized 'J'. The middle initial 'F.' is written in a smaller, more compact script. The last name "Connolly" is written with a large, stylized 'C' and a long, sweeping tail that loops under the name.

Jennifer Fountain Connolly

cc: Steve W. Berman  
Beth Fegan  
Ivy Arai Tabbara